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AZ CORP COMMISSION
DOCKET CONTROL

Attorneys for Arizona Public Service Company

BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

SUSAN BITTER SMITH, Chairman
BOB STUMP
BOB BURNS
DOUG LITTLE
TOM FORESE

Arizona Corporation Commission

DOCKETED

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COMMISSION INQUIRY INTO
POSSIBLE MODIFICATION OF THE
COMMISSION'S HOLDING
COMPANIES AND AFFILIATED
INTEREST RULES, A.A.C. ARTICLE 8,
R14-2-801 ET SEQ.

DOCKET NO. AU-00000A-15-0246

**ARIZONA PUBLIC SERVICE
COMPANY COMMENTS**

Arizona Public Service Company (APS or Company) welcomes the opportunity to submit comments on the possible modification of the Arizona Corporation Commission (Commission) "Holding Companies and Affiliated Interest Rules" (Rules). These comments are necessarily brief given what the Company believes is the narrow scope of this proceeding.


As APS understands the issue under inquiry in this docket, certain telecommunication companies have suggested they be exempt from the Affiliated Interest Rules (Rules). APS does not have any objection to the rule amendment proposed by the competitive telecommunication companies to A.A.C. R14-2-802(A):

1 R14-2-802. Applicability

2 A. These rules are applicable to all Class A investor-owned utilities under the
3 jurisdiction of the Commission and are applicable to all transactions
4 entered into after the effective date of these rules. Notwithstanding the
5 preceding sentence, these rules shall not apply to a telecommunications
6 utility whose retail telecommunications services have been classified as
7 competitive by the Commission pursuant to A.A.C. R14-2-1101 et seq.,
8 except as may otherwise be determined by a future Commission order.

9 However, the Company would oppose any other amendments to the Rules that would
10 have the effect of increasing the affiliate regulation of electric utilities or affect any of
11 the waivers granted by the Commission to APS and Pinnacle West Capital Corporation
12 by Decision No. 61973 (October 6, 1999). For this reason, APS reserves the right to
13 supplement these comments should the scope of this docket expand beyond
14 consideration of the exemption of competitive telecommunications companies from the
15 Rules.

16
17 RESPECTFULLY SUBMITTED this 14th day of December, 2015.

18
19 By: 
20 Thomas L. Munaw
21 Melissa M. Krueger

22 Attorneys for Arizona Public Service Company

23 ORIGINAL and thirteen (13) copies
24 of the foregoing filed this 14th day of
December, 2015, with:

25 Docket Control
26 ARIZONA CORPORATION COMMISSION
27 1200 West Washington Street
28 Phoenix, Arizona 85007